

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-2 When you set a new pole for new construction, a new pole for construction of public works projects, and a new pole beside an existing pole as a maintenance project, please describe the accounting process used for placement into rate base.

REPLY: A telephone pole is a depreciable asset booked as a retirement unit. Upon notification of a pole placement from the field, Account 1220.1 (Non Exempt Inventory) is credited and Account 2411 (Poles) is debited. Poles may be booked into telephone plant under construction (TPUC) or telephone plant in-service status at placement. If TPUC, the plant is subsequently transferred to an in-service status at the request of engineering.

VZ #83

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-3 For the same conditions as stated in Request #3 above, please describe your process for removing poles from rate base.

REPLY: Upon notification of a pole retirement from the field, Account 2411 is credited and Account 3100.41 (Depreciation Reserve) is debited.

VZ #84

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson

Title: Manager – OSP Engineering

Respondent: Troy McDonald

Title: Joint Lines Specialist – ME, VT, NH

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

- ITEM:** Staff 3-5
- a. Upon receipt of a proper notification from a joint owner regarding new construction and a request to set a pole in Verizon's maintenance area, if Verizon is unable to respond to the request in a timely manner (i.e., within 60 days of receipt of the request) would Verizon allow the joint owner to set the pole and bill Verizon? If yes, how should the cost of this service be established? If no, why not? How long would the joint owner have to wait, after a proper notification, before Verizon would allow them to set the pole?
 - b. If the time required for Verizon to respond to the request was in excess of 60 days, and such delay was the direct and sole cause to the other joint owner of additional costs, would Verizon accept any responsibility for these costs? If not, why not? How long would the delay have to be, and how often would such delays have to occur, before Verizon would agree to accept financial responsibility for costs of the delay?

REPLY: The request appears to address two types of notifications, with different response obligations for the parties involved. The first type of notification, regarding "pole sets," is addressed in each IOP and varies in administration. A pole set notification, which occurs through the use of the exchange-of-notice (EON) process, is the vehicle for one joint owner to notify the other that a pole will be placed in its maintenance area or to request the placement of a pole in the other

REPLY:

company's maintenance area. The company receiving the EON is then responsible to notify the joint owner who initiated the notice if there is a desire to attach to the pole being placed or if there is a desire to place a pole within the maintenance area of the party receiving the EON. The response times associated with the above vary for each IOP, from 14 days to 30 days.

The second type of notification is related to pole transfers. "Transfer notifications" are issued when poles are being replaced. Verizon NH currently has agreements with PSNH and Until to transfer work, after proper notification, within 60 days. None of the other IOPs have provisions for a fixed transfer schedule.

Based upon the above, Verizon NH responds as follows to the request for information regarding new pole sets:

- a. Individual agreements between Verizon NH and each power company specify the timeframe for Verizon NH to respond to the notification received from a joint pole owner. Due to contractual labor agreements, if Verizon NH receives a request for service prior to the receipt of notification from the joint owner, or within the time allowed to respond to the notification from the joint pole owner, Verizon NH would not be in a position to allow the joint owner to place the pole. Verizon NH only places poles when it has a legitimate service need. If Verizon NH does not have a valid service request, the joint owner would be notified that Verizon NH does not have an interest in joint ownership of the pole, at which point the pole could be placed by the power company as a solely owned pole.
- b. There are no provisions in the joint ownership agreements that provide for compensation to one joint owner due to delay on the part of the other joint owner.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-7 What is the average time it takes for a work order for a single pole to be written, issued, scheduled and set in your maintenance area, and are there intervals between any of the functions listed that make estimating an average difficult or impossible?

REPLY: The average time to engineer and place a single pole is not tracked in the normal course of business. Please see Verizon NH's response to Staff 1-32 for a description of the process used to fulfill a "499" service order request for a new pole.

VZ #88

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan
Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-10 With regard to transferring equipment to a new pole from an existing location, please describe the process on how you include third party (defined as all others except electric and telephone) entities into the process. As part of your response, describe any problem areas encountered.

REPLY: The relevant power company provides a “notice to transfer” request to all attached third party licensees and Verizon NH to transfer their respective plant to the new pole(s), once it has completed all its transfer work to the new pole. From this point forward, there is typically no follow-up by the electric company of licensee activity and progress. Per New Hampshire pole attachment agreements, each licensee has fifteen days to complete the work upon receipt of notification.

The burden generally falls upon Verizon NH to administer the process of coordinating the transfer of the third party plant among the respective parties so that, in turn, Verizon NH may transfer its plant and, if required, remove the old pole. Delays in timely transfers have occurred that have prevented Verizon NH from completing work within anticipated timeframes.

VZ #91

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-12 In several operating agreements with the electric companies, Verizon is responsible for removing a pole in the electric company maintenance area once it has been notified of the electric company transfer and more than 60 days have elapsed. Of the 2149 outstanding poles to be removed in the electric maintenance area (response to Staff 1-15), please estimate how many poles will Verizon be removing due to the conditions described above?

REPLY: Verizon NH does not agree with the premise that “Verizon is responsible for removing a pole in the electric company maintenance area once it has been notified of the electric company transfer and more than 60 days have elapsed.”

As the first party to move plant, the electric company initiates the notification to all the other third party licensees, whose plant is positioned above Verizon, to transfer their plant before Verizon is notified to transfer. While this notification occurs, generally on a blanket basis, there is no tracking mechanism for all parties to use to monitor individual progress. All parties are being notified at the same time even though the work requirement is sequential. As a result of the current process, it is not possible to estimate how many poles VZ can remove independent of third party licensee work that is not complete.

VZ #93

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-15 Do your pole inventories contain records of which licensees are attached to your poles? If yes, please provide the information.

REPLY: Verizon New Hampshire considers certain information responsive to this request to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

The Verizon license administration group (LAG) maintains records of which parties have been granted licenses to attach to poles in which Verizon NH has a sole ownership, joint ownership or joint use interest, or to occupy ducts in Verizon NH's underground conduit system. Please see the proprietary attachment for a list of those licensees.

VZ #96

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Gloria L. Harrington
Title: Manager

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-16 Do you require licensees to tag their facilities on a pole? Do you enforce the policy? Please describe your enforcement procedures.

REPLY: Licensees are required to tag their facilities on a pole in accordance with Article 7.1.11 of the Verizon New Hampshire pole attachment agreement which states as follows:

For each new facility attached by Licensee to Licensor's poles, on or after the date of execution of this Agreement, Licensee shall place identification tags on cables located on poles and identification apparatus tags on any associated items of Licensee's Facilities. Licensee shall also place these identification tags when engaged in an Overlash or Rebuild project. Overlashed bundles require one tag per bundle, per Licensee. The requirements for identifications tags are set forth in the Blue Book.

Tagging of aerial plant is generally not enforced because a licensee's plant can be identified by its location on the pole.

VZ #97

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-19 What other methods or processes can be introduced to reduce the time it takes to transfer and remove a pole?

REPLY: A more formal notification process could be beneficial to all attachees. The current system relies heavily on “fax” notification without any assurance that the intended recipient received the fax. Furthermore, completion notifications do not follow transfer work to let the next attachee know that the pole is ready for its work to be performed. A more formal, electronic-based means of communicating with all attachees simultaneously would keep track of whose work is being done, on which poles, and on what day of the schedule each company will have completed their work.

Verizon NH and PSNH have begun discussions on such a process and would be willing to keep the parties in this proceeding informed of any progress.

VZ #100

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-31 How many miles of overhead line does your company own and maintain in your New Hampshire service area(s)?

REPLY: As of December 2005, Verizon NH owned and maintained 23,079 sheath miles of aerial cable in the State of New Hampshire.

VZ #112

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Martin Wilkinson
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3

DATED: February 7, 2006

ITEM: Staff 3-35 Please reference IOP #17 of the Intercompany Operating Procedures between Verizon and Unitil. Please explain how Verizon determines whether or not it will benefit from Joint Tree Trimming.

REPLY: Verizon NH may benefit from joint trimming in those instances where there is a need for trimming heavy foliage in a pole line in order for Verizon NH to place a new cable (and Unitil has notified Verizon NH that the sections in question are on its maintenance trim list) or because of storm or hazardous conditions.

Verizon NH typically needs only a four foot by four foot window trimmed for the placement of an additional cable, and not necessarily ground cut. If the location to be window trimmed by Verizon NH was also on Unitil's maintenance trim list, or if Unitil was willing to reprioritize locations in its vegetation management program, there would be a determination by Verizon NH to proceed with joint trimming.

When faced with the need to trim due to heavy storm work or a hazardous tree situation, Verizon NH could also make the determination that there was a benefit to joint tree trimming.

In any event, however, the need would exist to verify that the locations in the field were actually trimmed and/or the locations trimmed in a storm or hazardous tree situation were in fact for sections containing Verizon NH's facilities.